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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JANET GARCIA, GLADYS ZEPEDA,
14 MIRIAM ZAMORA, ALI EL-BEY, PETER
15 DIOCSO JR., MARQUIS ASHLEY, JAMES
16 HAUGABROOK, individuals, Ktown for
17 ALL, an unincorporated association,
18 ASSOCIATION FOR RESPONSIBLE and
19 EQUITABLE PUBLIC SPENDING an
20 unincorporated association,

21 *Plaintiffs,*

22 vs.

23 CITY OF LOS ANGELES, a municipal entity;
24 DOES 1-50,

25 *Defendant(s).*

Case No.: 2:19-cv-6182-DSF-PLA
Assigned to Judge Dale S. Fischer

**DECLARATION OF GABRIELA
MEDINA ISO DEFENDANT CITY
OF LOS ANGELES'
OPPOSITION TO MOTION FOR
PRELIMINARY INJUNCTION**

Concurrently Filed Documents:

- Memorandum of Points & Authorities ISO Opposition
- Declarations ISO Opposition: Dermer, Wong, Pereida, Ramirez, Rankin, Guerrero, Haines, Medina, Banks, Bernal, Rodriguez, Diaz
- Request for Judicial Notice
- Evidentiary Objections

Date: March 30, 2020
Time: 1:30 p.m.
Ctrm: 7D

DECLARATION OF GABRIELA MEDINA

I, GABRIELA MEDINA, hereby declare:

1. I currently work in the Office of Los Angeles City Councilmember Joe Buscaino, who represents the Fifteenth Council District, which covers the Los Angeles neighborhoods of Watts, San Pedro, Wilmington, Harbor City, and Harbor Gateway. I am the District Director for the Fifteenth Council District. I joined this office on January 24, 2012. I have personal knowledge of the facts contained herein, and if called to testify I could and would do so competently.

2. In my role as District Director for the Fifteenth District, I work to ensure that our District's communities have access to city resources, directly advancing the opportunities of residents. In my role, I also oversee initiatives addressing homelessness in our District.

3. Throughout our District, of which 40% is zoned for industrial uses, I frequently observe large items in the public right of way that are larger than could fit in a 60-gallon container with the lid closed. Examples of such items that I frequently encounter in the public rights of way include boats, tubs, jacuzzis, sofas, industrial waste, automobile parts, bed frames, mattresses, and other household appliances. I observe items such as these on a weekly basis during community drives.

4. In addition to blocking access for individuals with disabilities, these large items impede sidewalks, driveways, access to alleys, and parking spaces throughout our District.

5. For example, at the intersection of Lomita Boulevard and McCoy Avenue in Harbor City, on numerous occasions during my tenure with the Fifteenth District, I have personally witnessed the presence on the public right of way of items that are larger than could fit in a 60-gallon container with the lid closed. Such items include, but are not limited to, large chairs, mattresses, and sofas.

6. Normont Elementary School is located at 1001 West 253rd Street in Harbor

1 City, which is less than 1,000 feet away from the intersection of Lomita Boulevard and
2 McCoy Avenue. I have personally witnessed children walking to or from school forced to
3 walk into Lomita Boulevard to get around large items blocking their path. The sidewalk
4 on Lomita is 14 feet wide, yet children continue to be exposed to the street to access their
5 school. I have received constituent complaints about the chronic and recurring presence
6 of these large items on the sidewalk, which poses a danger to children when they are
7 forced to walk into the street, particularly where cars heading eastbound on Lomita
8 Boulevard to the 110 Freeway are typically not driving slowly.

9 7. In San Pedro, underneath 1945 W. Anaheim Street, there is a trail, which is
10 adjacent to a park and a residential neighborhood. I have personally observed, and
11 received constituent complaints regarding, an accumulation of items at this location that
12 are larger than could fit in a 60-gallon container with the lid closed. Our office has
13 received complaints from neighboring residents, affected business owners, local school
14 personnel, parents, and other stakeholders that the accumulation of such items makes it
15 difficult for trash collection and emergency vehicles to access this area due to such large
16 items.

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18 8. In Wilmington, there is a homeless encampment located in the alley behind
19 525 Broad Avenue. I have personally witnessed, on numerous occasions, items at this
20 location that are larger than could fit in a 60-gallon container with the lid closed. When
21 such items accumulate, access paths to private properties and to the alley become difficult
22 to traverse, if they are not entirely blocked.

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1 I declare under penalty of perjury under the laws of the State of California and the
2 United States that the foregoing is true and correct, and that this Declaration was
3 executed on March 6th, 2020, at Los Angeles, California.

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5
6 GABRIELA MEDINA